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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

Jenny Lisette Flores., *et al.*,
Plaintiffs,
v.
William Barr, Attorney General of the
United States, *et al.*,
Defendants.

Case No. CV 85-4544-DMG-AGR_x

**JOINT PROPOSAL REGARDING
NOTICE TO *FLORES* CLASS
MEMBERS OF PLAINTIFFS'
AMENDED MOTION FOR
AWARD OF ATTORNEYS' FEES**

Hearing: October 11, 2019

[HON. DOLLY M. GEE]

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1 On June 21, 2018 Defendants' filed Defendants' *Ex Parte* Application For
2 Limited Relief from Settlement Agreement ("*Ex Parte* Application") [Dkt. # 435].
3 On July 09, 2018, the Court denied Defendants' *Ex Parte* Application (Dkt. # 455).
4 Plaintiffs then filed their Amended Motion for Award of Attorneys' Fees
5 ("*Motion*") [Dkt. #550] pursuant to the Equal Access to Justice Act, 28 U.S.C. §
6 2412(d) ("*EAJA*") for an award of attorney's fees and costs in securing the July 9,
7 2018, Order. In accordance with the Court's Order Re Provision of Class Notice for
8 Plaintiffs' Motion for Award of Attorneys' Fees [Dkt. #601], the parties
9 respectfully submit the following Joint Proposal regarding notice to *Flores* class
10 members of Plaintiffs' *EAJA* Motion.
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12 Within five (5) days of the Court's Order, Plaintiffs will provide to
13 Defendants copies of the approved Notice to *Flores* Class Members ("*Notice*"), in
14 both English and Spanish. Within twenty (20) days of the issuance of the Court's
15 Order, Defendants will post the approved Notice in English and Spanish at all
16 Immigration and Customs Enforcement ("*ICE*") family residential centers where
17 minors are held. The proposed Notice is attached as Exhibit 1. Defendants will
18 notify Plaintiffs' Class Counsel in writing when the Notices have been posted and
19 of the locations where posted. The notice period will be no less than be 30 days.
20 Fifty (50) days following the issuance of the Court's Order, Plaintiffs' Class
21 Counsel shall file and serve any objections received, redacted as appropriate, or
22 notify the Court that no objections have been received. On or before September 27,
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2019, Plaintiffs and Defendants shall file a joint report regarding any objections received from class members during the period for the submission of objections and Plaintiffs' Class Counsel will file their Reply Brief to Defendants' Opposition to Plaintiffs' Amended Motion for Award of Attorneys' Fees [Dkt. # 597]. The parties respectfully request the Court set a hearing date on Plaintiffs' Motion and any timely objections for October 11, 2019.

Respectfully submitted,

Dated: July 29, 2019

/s/ Peter Schey
Class Counsel for Plaintiffs
CENTER FOR HUMAN RIGHTS &
CONSTITUTIONAL LAW
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Carlos Holguín
Laura N. Diamond
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/s/ Sarah B. Fabian
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U.S. DEPARTMENT OF JUSTICE
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CERTIFICATE OF SERVICE

I, Peter Schey, declare and say as follows:

I am over the age of eighteen years of age and am not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 256 S. Occidental Blvd., Los Angeles, CA 90057, in said county and state.

On July 29, 2019 I electronically filed the following document(s):

- **JOINT PROPOSAL REGARDING NOTICE TO *FLORES* CLASS MEMBERS OF PLAINTIFFS' AMENDED MOTION FOR AWARD OF ATTORNEYS' FEES; AND**
- **EXHIBIT 1**

with the United States District Court, Central District of California by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

/s/Peter Schey
Attorney for Plaintiffs